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 Attorneys for Defendant

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

DOUGLAS AMES ECCLES,	)	Case No. 1:24-cv-04461-RMI
	)	
Plaintiff,	)	<b>STIPULATION AND <del>PROPOSED</del></b>
	)	<b>ORDER FOR AN EXTENSION OF TIME</b>
vs.	)	
	)	
CAROLYN COLVIN,	)	
Commissioner of Social Security, <sup>1</sup>	)	
	)	
Defendant.	)	
	)	

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Defendant shall have a 28-day extension of

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<sup>1</sup> Carolyn Colvin became the Acting Commissioner of Social Security on November 30, 2024. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Carolyn Colvin should be substituted for Martin O'Malley as the defendant in this suit. No further action need be taken to continue this suit by reason of the last sentence of section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

1 time, from December 19, 2024, to January 16, 2025, for Defendant to respond to Plaintiff's  
 2 Opening Brief (ECF No. 9).

3 This is Defendant's SECOND request for an extension of time in this case. Good cause  
 4 exists for this extension because Defendant is currently exploring settlement options. The  
 5 undersigned attorney for Defendant is still in discussions with the relevant agency component  
 6 regarding settlement but needs more time to complete the process. Additionally, the undersigned  
 7 attorney for Defendant is scheduled to be out of the office on leave from December 23 to  
 8 December 27, 2024. If settlement is not possible, Defendant's counsel will need additional time  
 9 to draft a response to Plaintiff's Opening Brief.

10 This request is made in good faith and with no intention to unduly delay the proceedings,  
 11 and counsel apologizes for any inconvenience.

12 Plaintiff does not oppose Defendant's request for an extension of time. The parties further  
 13 stipulate that the deadline for any reply by Plaintiff, if necessary, will be extended accordingly.

14  
 15 Respectfully submitted,

16 Dated: December 19, 2024

17 /s/ Francesco Benavides  
 18 (\*as authorized via email on December 19, 2024)  
 19 FRANCESCO BENAVIDES  
 Attorney for Plaintiff

20 Dated: December 19, 2024

21 ISMAIL J. RAMSEY  
 United States Attorney

22 By: /s/ Ryan Lu  
 23 RYAN LU  
 Special Assistant U.S. Attorney

24 Attorneys for Defendant  
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1 Pursuant to Section 5-1(h) of the Civil Local Rules of the United States District Court for  
2 the Northern District of California, I certify that the content of this document is acceptable to  
3 counsel for Plaintiff and that I have obtained authorization from Francesco Benavides, to affix  
4 their electronic signature to this document.

5 /s/ Ryan Lu  
6 RYAN LU  
7 Special Assistant U.S. Attorney

8 ORDER

9 Pursuant to stipulation, IT IS SO ORDERED.  
10

11  
12 Dated: 12/20/2024

13   
14 THE HON. ROBERT M. ILLMAN  
15 United States Magistrate Judge  
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